



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

July 14, 2010

A. Wade Pursell
Executive VP and Chief Financial Officer
SM Energy Company
1776 Lincoln Street, Suite 700
Denver, Colorado 80203

Re: SM Energy Company
Form 10-K for the Fiscal Year Ended December 31, 2009
Filed February 24, 2010
File No. 1-31539

Dear Mr. Pursell:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

H. Roger Schwall
Assistant Director